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24 UNITED STATES DISTRICT COURT  
25 SOUTHERN DISTRICT OF CALIFORNIA

26 IN RE SONY VAIO COMPUTER  
27 NOTEBOOK TRACKPAD  
28 LITIGATION,

Case No.: 3:09-CV-02109-BAS-MDD

CLASS ACTION

JOINT MOTION TO EXTEND  
CERTAIN SCHEDULING ORDER  
DEADLINES RELATING TO  
EXPERTS AND MOTIONS

Judge: Honorable Cynthia A. Bashant  
Courtroom: 4B, 4<sup>th</sup> Floor (Schwartz)  
Mag. Judge: Hon. Mitchell D. Dembin  
Courtroom: 2C

Plaintiffs Christina Egner and Ricky Glasco (“Plaintiffs”) and Defendant Sony Electronics Inc. (“Sony”) (collectively, the “Parties”), by and through their respective counsel, hereby jointly submit this motion to extend certain deadlines relating to expert depositions and dispositive/*Daubert* motions set forth in the Court’s September 15, 2014 Amended Scheduling Order (Dkt. No. 217) (“September Order”) and Order Granting Joint Motion to Continue Expert Disclosure and October 17, 2014 Discovery Deadlines and Related Dispositive/*Daubert* Motion Filing Deadline (Dkt. No. 222) (“October 2014 Order”).

WHEREAS, pursuant to the October 2014 Order, the Court set the deadline to depose experts on or before January 26, 2015, and all motions, including *Daubert* motions and summary judgment motions, other than motions to amend or join parties, or motions *in limine*, to be filed on or before February 16, 2015.

WHEREAS, the Parties have cumulatively designated nine expert witnesses whose depositions need to be taken. The Parties worked diligently and cooperatively together on scheduling the expert depositions to occur prior to the January 26, 2015 cutoff. Unfortunately, due to an unexpected death of a family member of lead Plaintiffs’ attorney, Ms. Zeldes, in combination with scheduling nine expert depositions given the experts, Parties, and counsels’ respective schedules and the end of the year and January holidays, the Parties were unable to complete expert depositions prior to January 26, 2015.

WHEREAS, after extensive meet and confer efforts and cooperation, the Parties have agreed to the following deposition schedule:

Expert	Date
Jim Vaughn	February 3, 2015
Heather Xitco	February 13, 2015
Glenn Ahkavein	February 16, 2015
Andrew Perry	February 18, 2015

Expert	Date
Jack E. Gold	February 19, 2015
Michael Osterman	February 20, 2015
Robert Wallace	February 23, 2015
Robert J. Sherwood	February 26, 2015
Craig Hillman	March 2, 2015

WHEREAS, on January 7, 2015, the Court issued an Order Granting in Part and Denying in Part Plaintiffs' Motion for Approval of Class Notice Proposal (Dkt. No. 225) ("Class Notice Order"). Plaintiffs have been working diligently with the class action administrator and anticipate class notice pursuant to the Class Notice Order commencing mid-February 2015.

WHEREAS, notice must be provided and the notice provision and opt-out periods must expire before a ruling on summary judgment motions to apply to class members and expert depositions must similarly be completed before summary judgment.

WHEREAS, Plaintiffs will initiate the notice program consistent with the Class Notice Order on or before February 20, 2015.

NOW THEREFORE, the Parties hereby propose that the deadlines in the September Order and October Order be amended as follows:

Action	Current	Proposed
Deadline for Expert Depositions	January 26, 2015	March 3, 2015
Deadline to file motions, including <i>Daubert</i> and summary judgment motions, other than motions to amend or join parties, or motions <i>in limine</i>	February 16, 2015	March 17, 2015

WHEREAS, all other dates and deadlines set forth in the September Order (Dkt. No. 217) remain unchanged.

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WHEREAS, the proposed extension will not impact the pre-trial or trial dates or deadlines in this matter, and the Parties agree there is no prejudice to any party resulting from this continuance.

Respectfully submitted,

Dated: February 2, 2015

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12 ECF CERTIFICATION

13 Pursuant to Section 2(f)(4) of the Electronic Case Filing administrative  
14 Policies and Procedures Manual, I hereby certify that the content of this  
15 document is acceptable to Defendants' counsel and that I have obtained  
16 concurrence regarding the filing of this document from the signatories to this  
17 document.

18 Dated: Februarv 2. 2015

19  
20 By: s/Aaron M. Olsen  
AARON M. OLSEN

CERTIFICATE OF SERVICE

I hereby certify that on February 2, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the Electronic Mail Notice List.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on February 2, 2015.

s/Aaron M. Olsen

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